

NO. 13-20-00125-CV

IN THE COURT OF APPEALS
FOR THE THIRTEENTH JUDICIAL DISTRICT OF TEXAS
AT CORPUS CHRISTI

FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
3/20/2020 3:31:44 PM
KATHY S. MILLS
Clerk

Dr. Lalitha Madhav Janaki

Appellant

v.

C.H. Wilkinson Physician Network d/b/a Christus Physician Group, Christus Spohn Hospital – Corpus Christi and Christus Spohn Hospital Corpus Christi – Shoreline, and Christus Spohn Cancer Center – Calallen and Christus Spohn Cancer Center – Shoreline

Appellees

Appeal from the 319th Judicial District Court
Of Nueces County, Texas
Cause No. 2017-DCV-4930-G

Appellant's Motion to Consolidate Appeals

Gregg M. Rosenberg
Texas State Bar No. 17268750
Renee Nguyen
Texas State Bar No. 24096093
ROSENBERG SPROVACH
3518 Travis, Suite 200
Houston, Texas 77002
Telephone (713) 960-8300
Facsimile (713) 621-6670
gregg@rosenbergglaw.com
renee@rosenbergglaw.com

Counsel for Appellant Dr. Lalitha Madhav Janaki

TO THE HONORABLE JUSTICES OF SAID COURT:

The issue being presented to this Court involves the proposed consolidation of three appeals, all which arise from the same lawsuit but resulted in three separate orders granting summary judgment in favor of three different, but related, entities. Appellant, Dr. Lalitha Janaki, moves to consolidate the appeals in Cause Numbers 13-20-00125-CV, 13-20-0126-CV, and 13-20-00127-CV for all purposes. Appellant filed a notice of appeal on March 3, 2020 and the clerk assigned 3 separate cause numbers to the cases. Each appellate cause number arises out of the same issues, facts, parties, documents, and records. In the interest of judicial efficiency, Appellant respectfully requests that the consolidated appeal proceed under Cause Number 13-20-00125-CV which would act to consolidate the appeals for 13-20-0126-CV and 13-20-00127-CV within them. Briefing for each summary judgment order can be addressed in sections under the same appellate cause number. Additionally, Appellant proposes that her briefing proceed in accordance with the Texas Rules of Appellate Procedure and the notice of appeal date of March 3, 2020 filed for Cause Number 13-2-00125-CV.

Respectfully submitted,

/s/ **Gregg M. Rosenberg**

Gregg M. Rosenberg
Texas State Bar No. 17268750
Renee Nguyen
Texas State Bar No. 24096093
ROSENBERG SPROVACH
3518 Travis, Suite 200
Houston, Texas 77002
Telephone (713) 960-8300
Facsimile (713) 621-6670
gregg@rosenberglaw.com
renee@rosenberglaw.com

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of this document on the following counsel by means of the ECF electronic filing system on March 20, 2020, to:

Yvonne K. Puig
Daphne Andritsos Calderon
Norton Rose Fulbright US LLP
98 San Jacinto Blvd., Suite 1100
Austin, TX 78701

/s/ **Gregg M. Rosenberg**

Gregg M. Rosenberg